

1 GIA N. MARINA
Nevada Bar No. 15276
2 **CLARK HILL PLLC**
1700 South Pavilion Center Drive, Suite 500
3 Las Vegas, Nevada 89135
E-mail: gmarina@clarkhill.com
4 Telephone: (702) 862-8300
5 Facsimile: (702) 778-9709
Attorney for Defendant
6 *Equifax Information Services LLC*

7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ESSEX CHAMBERLAIN,

11 Plaintiff,

12 vs.

13 EQUIFAX INFORMATION SERVICES LLC
14 and INNOVIS DATA SOLUTIONS, INC.,

15 Defendants.

)
) **Case No. 2:25-cv-00023-JCM-BNW**
)

)
) **JOINT MOTION FOR EXTENSION OF**
) **TIME FOR DEFENDANT EQUIFAX**
) **INFORMATION SERVICES LLC TO**
) **FILE ANSWER**
)

) **FIRST REQUEST**
)
)

16
17
18
19 Defendant Equifax Information Services LLC (“Equifax”) has requested an extension of
20 time to answer, move or otherwise respond to the Complaint in this matter, to which Plaintiff has
21 no opposition. Accordingly, pursuant to LR IA 6-2, IT IS HEREBY STIPULATED AND AGREED
22 to by and among counsel, that Defendant Equifax Information Services LLC’s time to answer, move
23 or otherwise respond to the Complaint in this action is extended from February 6, 2025 through
24 and including **March 10, 2025**. The request was made by Equifax so that it can have an opportunity

25 //

26 //

27

28

1 to collect and review its internal files pertaining to the allegations in the Complaint, and Plaintiff
2 approves. This stipulation is filed in good faith and not intended to cause delay.

3 Respectfully submitted, this 3rd day of February, 2025.

4
5 CLARK HILL PLLC

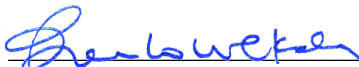
6 By: /s/Gia N. Marina
7 Gia N. Marina
8 Nevada Bar No. 15276
9 1700 South Pavilion Center Drive, Suite 500
10 Las Vegas, Nevada 89135
11 Telephone: (702) 862-8300
12 Facsimile: (702) 778-9709
13 Email: gmarina@clarkhill.com
14 *Attorney for Defendant Equifax Information*
15 *Services LLC*

No opposition

/s/ Gerardo Avalos
George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW GROUP
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: ghaines@freedomlegalteam.com
Email: gavalos@freedomlegalteam.com

Attorneys for Plaintiff

16 IT IS SO ORDERED:

17
18 
19 United States Magistrate Judge

20 DATED: 2/4/2025

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served this 3rd day of February, 2025, via CM/ECF, upon all counsel of record:

By: /s/ Gia N. Marian
Gia N. Marina
Nevada Bar No. 15276
1700 South Pavilion Center Drive, Suite 500
Las Vegas, Nevada 89135
Telephone: (702) 862-8300
Facsimile: (702) 778-9709
Email: gmarina@clarkhill.com